

HONORABLE MARY JO HESTON

Date: Friday November 20, 2020

Time: 9:00 a.m.

Hearing Location:

Tacoma Federal Courthouse Union Station

Courtroom H

1717 Pacific Avenue, Ste 2100

Tacoma, WA 98402-3233

Response Date: Friday November 13, 2020

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

IN RE:

BK Case No. 19-42890-MJH

SARAH HOOVER,

Debtor,

SARAH HOOVER,

Plaintiff,

v.

Adversary Case No. 20-04002-MJH

RENEWED MOTION FOR SUMMARY
JUDGMENT AND DISMISSAL BY
DEFENDANT QUALITY LOAN SERVICE
CORP. OF WASHINGTON

QUALITY LOAN SERVICE CORP. OF
WASHINGTON, et. al.,

Defendants.

I. NOTICE OF HEARING

PLEASE TAKE NOTICE that defendant Quality Loan Service Corp. of Washington is renewing its motion for summary judgment and dismissal from the above-captioned adversary case, set for hearing as follows:

Judge	Honorable Mary Jo Heston
Date	Friday November 20, 2020
Time	9:00 a.m.

Place	Tacoma Federal Courthouse Union Station Courtroom H 1717 Pacific Avenue, Ste 2100 Tacoma, WA 98402-3233
Response Date	Friday November 13, 2020

If you oppose the Motion, you must file your written response with the Clerk's office of the Bankruptcy Court and deliver copies to the undersigned not later than the Response Date.

If no response is timely filed and served, the Court may, in its discretion, grant the Motion prior to the hearing without further notice, and strike the hearing.

II. MOTION

Quality Loan Service Corp. of Washington renews its motion for summary judgment. For the reasons set forth in Quality's prior summary judgment briefing¹, which is incorporated herein, there are no genuine issues of material fact and dismissal of Quality is appropriate as a matter of law.

DATED October 15, 2020

/s/ Joseph Ward McIntosh

Joseph Ward McIntosh, WSBA #39470

Attorney for Quality Loan Service Corp. of Washington

¹ Dkts #13 and #29

Certificate of Service

The undersigned makes the following declaration:

1. I am now, and at all times herein mentioned was a resident of the State of Washington, over the age of eighteen years and not a party to this action, and I am competent to be a witness herein.

2. On October 15, 2020 I caused a copy of the ***Renewed Motion for Summary Judgment and Dismissal by Defendant Quality Loan Service Corp. of Washington*** to be served to the following in the manner noted below:

Jason D. Anderson Anderson Law of King County, PLLC 787 Maynard Ave. S., Suite B Seattle, WA 98104 Attorneys for Plaintiff / Debtor	<input type="checkbox"/> US Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> CM/ECF
Christina L. Henry Henry & Degraaff, P.S. 787 Maynard Ave. S., Suite B Seattle, WA 98104 Attorneys for Plaintiff / Debtor	<input type="checkbox"/> US Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> CM/ECF
Ryan S. Moore Robert W. Norman Houser, LLP 600 University St., Suite 1708 Seattle, WA 98101 Attorneys for Defendants PHH Mortgage Corporation, HSBC Bank USA, N.A., and NewRez, LLC	<input type="checkbox"/> US Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> CM/ECF
John A. McIntosh Schweet Linde & Coulson, PLLC 575 S. Michigan St. Seattle, WA 98108 Attorneys for Defendant IH6 Property Washington, LP	<input type="checkbox"/> US Mail, Postage Prepaid <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> CM/ECF

1 I declare under penalty of perjury under the laws of the state of Washington that the foregoing is
2 true and correct.

3 Signed this 15th day of October, 2020.

4
5 /s/ Kristine Stephan
6 Kristine Stephan, Paralegal
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28